

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
GERARDO MOTA BAUTISTA, HUGO BAUTISTA,
JUAN LUIS OVANDO ZEPEDA, JUAN ZEPEDA,
JULIO RICARDO ALVAREZ MACATOMA,
LEONCIO TORRES ACUNA, MARIO MORALES
ROJAS, OMAR RODRIGUEZ, and ANTONIO
LIMON HERNANDEZ

*Individually and on behalf of others similarly,
individually and on behalf of others similarly situated,*

Plaintiff,

-against-

COUNTY-WIDE MASONRY CORP., CARBEN
INDUSTRIES INC., CARBEN CONCRETE INC.,
CARBEN CONSTRUCTION INC., ANTHONY
DERASMO, ANTHONY LOGIUDICE, RONALD
BROWNING and MARTIN DOE a/k/a PERU,

Defendants.

19-CV-8808

PLAINTIFF HUGO
BAUTISTA'S RESPONSES
& OBJECTIONS TO
DEFENDANTS CARBEN
INDUSTRIES INC.,
CARBEN CONCRETE
INC., CARBEN
CONSTRUCTION INC.,
ANTHONY DERASMO,
ANTHONY LOGIUDICE,
and RONALD
BROWNING'S SECOND
SET OF
INTERROGATORIES

-----X
Plaintiff Hugo Bautista ("Plaintiff Bautista") by and through the undersigned counsel, hereby responds to Defendants Carben Industries, Inc., Carben Concrete, Inc., Carben Construction, Inc., Anthony LoGiudice, and Ronald Browning's Second Set of Interrogatories ("Requests") in accordance with the following objections.

The Responses herein reflect the knowledge of Plaintiffs as of the date of the Responses, and Plaintiffs' Responses involve an ongoing investigation into the Defendant's Requests. Plaintiffs' responses are made subject to each of the General Objections, Comments and Qualifications listed below, and such other objections as may be stated in the individual responses. Plaintiff Limon reserves his right to amend or supplement these Responses pursuant to Federal Rule 26(e)(1) as becomes necessary and appropriate.

Specific Responses & Objections to Interrogatories

1. With respect to the construction Project located at 120 Water Street, NY, NY as referenced in your Complaint, state the name of the company who you believe employed you to provide labor for this Project.

ANSWER: Countywide

2. With respect to the construction Project located at 70 Schemerhorn St., Brooklyn, NY, as referenced in your Complaint, state the name of the company who you believe employed you to provide labor for this Project.

ANSWER: Countywide

Dated: July 11, 2022
New York, New York

/s/_____
Catalina Sojo
CSM LEGAL, P.C.
60 East 42nd Street, Suite 4510
New York, New York 10165
(212) 317-1200
Attorneys for Plaintiffs

TO:

Matthew Lakind, Esq.
Tesser & Cohen
946 Main St.
Hackensack, NJ 07601
Ph: 201-343-1100
Email: mlakind@tesserochen.com

VERIFICATION

I, HUGO BAUTISTA, verify under penalty of perjury under the laws of the United States of America and New York that the foregoing facts and statements within the responses to the interrogatories directed to me are true and correct to the best of my knowledge.

By:

A handwritten signature in black ink, appearing to read "Hugo Bautista", written over a horizontal line.

HUGO BAUTISTA